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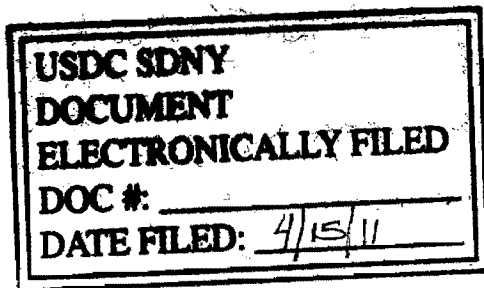
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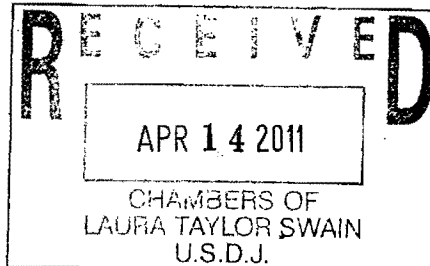
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By Hand

The Honorable Laura Taylor Swain
United States District Court
Southern District of New York
500 Pearl St.
New York, NY 10007-1312

April 14, 2011



MEMO ENDORSED

In re American International Group, Inc., 2008 Securities Litigation,
Master File No. 08-CV-4772 (LTS)(DCF)

Dear Judge Swain:

On behalf of the Underwriter Defendants in the above-captioned matter, I write to request an extension of the deadline for substantial completion of document production, currently scheduled for April 15, 2011, to June 1, 2011. This extension would not change the other dates in Case Management Order No. 1 and Amended Pretrial Scheduling Order No. 1. This is our first request for an extension of the production deadline. Pursuant to Rule 2(B) of Your Honor's Individual Practices, we have consulted with all parties, and none oppose our request.

For the last several months, the Underwriter Defendants have been gathering, reviewing and producing documents responsive to Lead Plaintiff's requests for document production and to date have made several productions pursuant to the Court's rolling production schedule. In furtherance of those efforts, we have met and conferred with counsel for Lead Plaintiff on a weekly basis to discuss the status of document collection and production and to focus our collection efforts on those documents Lead

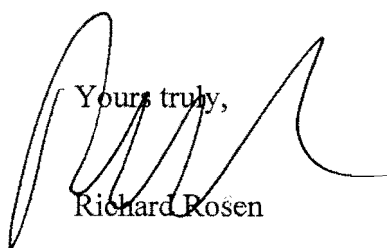
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2

Plaintiff views as most time-sensitive. Our most recent meet-and-confer was held on Tuesday, April 12, and we have scheduled another for Monday, April 18. However, we still are in the process of culling through a massive quantity of data on behalf of more than thirty clients in order to locate, collect and review documents to satisfy our production obligations. Each of those clients has its own corporate structure as well as unique document retention and retrieval systems and protocols. This has significantly complicated our task. Despite our best efforts, we will not be able to substantially complete our production by the April 15, 2011, production deadline given the volume of data that will need to be reviewed.

For these reasons, we believe that an extension of time until June 1, 2011, is necessary to allow us to meet our production obligations. We will continue to make rolling productions and have agreed with Lead Plaintiff to hold weekly meet-and-confers about the status of production. Furthermore, while we will make every good-faith effort to meet our production obligations by June 1, 2011, in view of the large volume of data we are gathering and reviewing as well as the complications associated with collecting documents from the Underwriters' collective hundreds of custodians, as June 1 approaches we must respectfully reserve the right to request an additional extension of time. Of course, we will remain in communication on an ongoing basis with Lead Plaintiff's counsel and will confer with them before making any further application to the Court.

Accordingly, we would respectfully request that the deadline for substantial completion of document production for the Underwriter Defendants be extended from April 15, 2011, to June 1, 2011.



Yours truly,

Richard Rosen

cc: All counsel (via email)

SO ORDERED:

DATE:

4/15/11

DEBRA FREEMAN
UNITED STATES MAGISTRATE JUDGE